



State of Kansas

Mike Hayden, Governor

Department of Health and Environment  
Northeast District Office

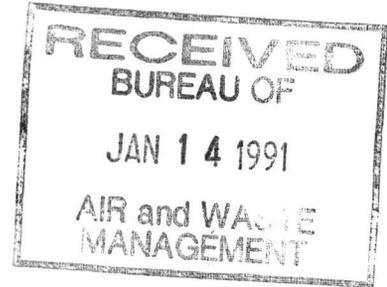
Stanley C. Grant, Ph.D., Secretary

808 W. 24th Street, Lawrence, Kansas 66046-4417

(913) 842-4600

January 8, 1991

Mr. William E. Dame  
Olin Water Services  
3155 Fiberglass Road  
Kansas City, Kansas 66115



Re: Hazardous Waste Compliance Inspection  
EPA Identification Number KSD000203638

Dear Mr. Dame:

On December 17, 1990, your facility was inspected to determine compliance with state hazardous waste regulations.

The inspection revealed that Olin Water Services generates hazardous waste from the preparation of liquid and powder water treatment formulations. These wastes are identified by the following waste codes:

- D001 Solid waste which exhibits the characteristics of Ignitability
- D002 Solid waste which exhibits the characteristics of Corrosivity
- D003 Solid waste which exhibits the characteristics of Reactivity
- D007 Solid waste which exhibits the characteristics of EP Toxicity for chromium
- F001 Methylene Chloride which exhibits the characteristics of being toxic
- Various U-Listed chemicals

In addition to being a generator Olin Water Services has a hazardous waste storage permit. The facility is, therefore, subject to the requirements of 40 CFR, Parts 260 to 264, 270 and 124 and the specific conditions of Permit Number KSD000203638.

The inspection identified the following items not in compliance with state and federal regulations concerning generators of hazardous waste:

1. During the inspection I noted the emergency contact person and warehouse evacuation route had changed. These changes require a Class I, II or III permit modification. The class of permit modifications are listed in Appendix I in 40 CFR, Part 270.42. Please contact Steve Broslavick at (913) 296-1609 in the Topeka office regarding the class type to be used by your facility.



Mr. William E. Dame  
January 8, 1991  
Page 2

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning this letter, please call me at the Northeast District Office in Lawrence at 913/842-4600.

Respectfully,



Jim Fischer  
Environmental Technician  
Inspections and Enforcement Section  
Bureau of Air and Waste Management

JF:gz

pc: Tom Gross, Bureau of Air and Waste Management  
Steve Broslavick, Bureau of Air and Waste Management  
NEDO

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: KSD000203638 Drew Industrial  
 2. FACILITY NAME: OLIN WATER SERVICE Ashland Chem  
 3. CITY: KANSAS CITY COUNTY: CLAY  
 4. No EPA ID:

5. FACILITY TYPE:  
 GEN  SQ  
 KG  TRANSPORTER  
 NOT A GENERATOR  
 GOVERNMENT FACILITY:  PUT F, S, OR L IN BOX  
 F - FEDERAL S - STATE L - LOCAL

6. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 12/17/90  
 INSPECTOR: JDF / LRIR

EPA COMPLIANCE  
 THIS BLOCK  
 GWM  SNC

7. TYPE OF EVALUATION COVERED BY THIS REPORT:  
 PUT CODE IN BOX CHOOSE ONE  I

1 - COMPLIANCE EVALUATION INSPECTION (CEI)  
 2 - SAMPLING INSPECTION  
 3 - RECORD REVIEW  
 4 - COMPLIANCE GWM EVALUATION (CME)  
 5 - COMPLIANCE SCHEDULE EVALUATION (CSE)  
 11 - CASE DEVELOPMENT INSPECTION  
 12 - OPERATION AND MAINTENANCE EVALUATION

8. DATE OF EVALUATION COVERED BY THIS REPORT (ENTER ONLY IF DIFFERENT FROM 6.): 1 / 1 (UPDATE)

9. AREA AND CLASS OF VIOLATION (ENTER NUMBER OF VIOLATIONS BY AREA AND CLASS):

CLASS OF VIOLATION	AREA OF VIOLATION														
	NOT.	PRE-TRANS.	ACCUM. 90 D.	GEN FAC. STANDARDS	PREP & PREVENT	CONT. & E.P.	STOR. COND.	GWM/RLS	CL/PCL	FIN REQ	PART B	COMP SCH.	MAN RPT	LAND BAN	OTHER
I															
II						X									X

10. ENFORCEMENT ACTIONS FOR VIOLATIONS: 1 8 91

AREA OF VIOLATION	TYPE OF ACTION TAKEN (CIRCLE ONE)	DATE ACTION TAKEN (MDY)	COMPLIANCE DATES (MDY)		PENALTY	
			SCHEDULED	ACTUAL	ASSESSED	COLLECTED
X	INFORMAL <u>WL/NOV</u> AO CIVAC CRIMAC	<u>1/10/91</u>	<u>IMMEDIATE</u>	/ /		
	INFORMAL WL/NOV AO CIVAC CRIMAC	/ /	/ /	/ /		
	INFORMAL WL/NOV AO CIVAC CRIMAC	/ /	/ /	/ /		
	INFORMAL WL/NOV AO CIVAC CRIMAC	/ /	/ /	/ /		

COMMENTS: EIGHTY CHARACTER LIMIT. Change w category plan being handled  
AS CLASS I PERMIT MANUFACTURING WILL BE  
REVIEWED/ APPROVED BY HAZ. WASTE SECTION - TAPER

128  
121